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Attorneys for Plaintiff

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 JANE DOE, an Individual,

10 Plaintiff,

11 vs.

12
13 CITY OF LAS VEGAS, CITY OF
14 HENDERSON, NATHAN HANNIG, an
15 Individual, MARIO RUEDA, an Individual,
16 RUBEN SANCHEZ, an Individual, JAMES
17 SUAREZ, an Individual, JONATHAN
18 CUFF, an Individual, JOSEPH "JOE"
19 VANEK, an Individual,
20 JAROD BARTO, an Individual, CODY
21 RACINE, an Individual JASON TULLIS,
22 an Individual, and ZACH YEOMAN, an
23 Individual, WILLIAM MCDONALD, an
24 Individual, and as an Individual, JON
25 STEVENSON, an Individual, JOHN DOE
26 #1, likely an Individual, DOES I -X; ROE
27 CORPORATIONS I -X.

28 Defendants.

CASE NO.: 2:19-cv-00382-GMN-BNW

24 **STIPULATION AND ORDER TO EXTEND THE TIME FOR PLAINTIFF TO**
25 **RESPOND TO DEFENDANTS' MOTION TO DISMISS**
26 **(FIRST REQUEST)**

27 COMES NOW, the Plaintiff, JANE DOE ("Jane"), by and through her attorney, JENNY
28 L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT ATTORNEYS LLP, and

1 Defendant, CITY OF LAS VEGAS, (“City of Las Vegas”), by and through their attorney,
2 JACK ESLINGER, ESQ., of THE LAS VEGAS CITY ATTORNEY’S OFFICE, Defendant,
3 CITY OF HENDERSON, (“City of Henderson”), by and through their attorney, BRIAN R.
4 REEVE, ESQ., of CITY OF HENDERSON CITY ATTORNEY’S OFFICE, Defendant,
5 NATHAN HANNING, (“Nathan”) an Individual, by and through his attorney, DEANNA L.
6 FORBUSH, ESQ., of MORRIS, POLICH & PURDY LLP, Defendant, MARIO RUEDA,
7 (“Mario”) an Individual, by and through his attorney, ADAM M. LEVINE, ESQ., of LAW
8 OFFICE OF DANIEL MARKS, LTD., Defendant, RUBEN SANCHEZ, (“Ruben”) an
9 Individual, by and through his attorney, JACK O’ESLINGER, ESQ., of THE LAS VEGAS
10 CITY ATTORNEY’S OFFICE, Defendant, JAMES SUAREZ, (“James”) an Individual, by and
11 through his attorney, JACK O’ ESLINGER, ESQ. of THE LAS VEGAS CITY ATTORNEY’S
12 OFFICE, Defendant, JONATHAN CUFF, (“Jonathan”) an Individual, by and through his
13 attorney, JACK O’ ESLINGER, ESQ. of THE LAS VEGAS CITY ATTORNEY’S OFFICE,
14 Defendant, JOSEPH “JOE” VANEK, (“Joe”) an Individual, by and through his attorney, JACK
15 O’ ESLINGER, ESQ. of THE LAS VEGAS CITY ATTORNEY’S OFFICE, Defendant,
16 JAROD BARTO, (“Jarod”) an Individual, by and through his attorney, MARC P. COOK, ESQ.,
17 of COOK AND KELESIS, LTD., Defendant, CODY RACINE, (“Cody”) an Individual, by and
18 through his attorney, CHRISTIAN JAMES GABROY, ESQ., of GABROY LAW OFFICES,
19 Defendant, JASON TULLIS, (“Jason”) an Individual, by and through his attorney, ADAM M.
20 LEVINE, ESQ., of LAW OFFICE OF DANIEL MARKS, LTD., Defendant, ZACH
21 YEOMAN, (“Zach”) an Individual, by and through his attorney, ADAM M. LEVINE, ESQ.,
22 of LAW OFFICE OF DANIEL MARKS, LTD., Defendant, WILLIAM MCDONALD,
23 (“William”) by and through his attorney, JACK O’ ESLINGER, ESQ. of THE LAS VEGAS
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CITY ATTORNEY'S OFFICE, Defendant, JON STEVENSON, ("Jon") an Individual, by and through his attorney, JACK O' ESLINGER, ESQ. of THE LAS VEGAS CITY ATTORNEY'S OFFICE, JOHN DOE #1, likely an Individual and hereby stipulate and agree as follows:

1. That the Response to the Defendants' Motions to Dismiss that are due on June 5, 2019; June 11, 2019 and June 14, 2019 collectively, and from the office of Daniel Marks, Ltd., Gabroy Law Offices and Cook and Kelesis, Ltd., will now be due on June 21, 2019.

2. That the Reply to the Response to the Defendant's Motions to Dismiss shall be due July 12, 2019.

3. This request for an extension of time is made in good faith and not for purpose of delay. This is the first request for an extension of time with respect to the Reply and Responses associated with Defendants' Motions.

Dated this 7th day of June, 2019.

Dated this 7th day of June, 2019.

HKM Employment Attorneys LLP

Law Office of Daniel Marks, Ltd.

/s/ Jenny Foley
Jenny L. Foley, Ph.D., Esq.
Nevada Bar No. 9017
1785 East Sahara Ave., Suite 300
Las Vegas, Nevada 89104

/s/ Adam M. Levine
Adam M. Levine, Esq.
Nevada Bar No. 4673
610 South Ninth Street
Las Vegas, Nevada 89101

Dated this 7th day of June, 2019.

Dated this 7th day of June, 2019.

Gabroy Law Offices

Cook and Kelesis, Ltd.


/s/ Christian J. Gabroy
Christian J. Gabroy, Esq.
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170 South Green Valley Parkway
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/s/ Marc P. Cook
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IT IS SO ORDERED that the Response to Defendants' Motions to Dismiss shall be due on June 21, 2019.

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Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT